

Message

From: Wiser, Nathan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F7333BDCD2DF46C1976275004E7AB7E2-WISER, NATHAN]
Sent: 12/20/2022 10:40:53 PM
To: Hall, Casey [Casey.Hall@meritenergy.com]
CC: Lyles, Kat [Kat.Lyles@meritenergy.com]; Kittinger, Eric [Eric.Kittinger@meritenergy.com]; Lampard, Melissa [Melissa.Lampard@meritenergy.com]
BCC: Chin, Lucita [Chin.Lucita@epa.gov]; Brown, Christopher [Brown.Christopher.T@epa.gov]; Minter, Douglas [Minter.Douglas@epa.gov]
Subject: RE: Merit FTP

Thank you Casey,

It is helpful to know that Merit is working to describe the on-going work to determine the cause of wellhead tubing/casing annulus pressures at the Steamboat Butte injection wells and will add file(s) with this description to the Merit FTP site. I'll periodically check email between now and the end of the year to find Merit's alert that the response to EPA's request for information has been completed. We may need to discuss these uploaded files more, likely in the New Year.

--Nathan Wiser, Environmental Scientist
U.S. EPA Region 8
1595 Wynkoop Street (mail code 8ENF-W-SD)
Denver, Colorado 80202
Email: wiser.nathan@epa.gov
Office: 303-312-6211

For information about the EPA R8 UIC Program: <https://www.epa.gov/uic/underground-injection-control-epa-region-8-co-mt-nd-sd-ut-and-wy>

From: Hall, Casey <Casey.Hall@meritenergy.com>
Sent: Tuesday, December 20, 2022 3:25 PM
To: Wiser, Nathan <Wiser.Nathan@epa.gov>
Cc: Lyles, Kat <Kat.Lyles@meritenergy.com>; Kittinger, Eric <Eric.Kittinger@meritenergy.com>; Lampard, Melissa <Melissa.Lampard@meritenergy.com>
Subject: RE: Merit FTP

Nathan,
Merit generally agrees with your summary of the documents uploaded to the FTP site. We have removed several documents upon further review which we determined were not responsive. The FTP site is organized as follows:

FOLDER 1: EPA Letter & Response – Eric

This folder is responsive to request #3 regarding the AMRs for calendar years 2020 and 2021.

- Subfolder 1: 2020
 - This includes a compiled Annual Disposal/Injection Well Monitoring Report for 2020 as well as the annual report separated out by well.
- Subfolder 2: 2021
 - This folder includes a compiled Annual Disposal/Injection Well Monitoring Report for 2021

Excel 1: MeritEnergy-SteamboatButteGasStudies12012022

- This includes the gas analysis that Merit will use to support the description of the work Merit has taken or is undertaking to determine the cause of the TCA pressures. Merit is currently working on this description and will upload as soon as completed but in no event later than the December 31st deadline.

Excel 2: MeritEnergy-TribalGasStudies12012022

- Same as above

Excel 3: SBB Inj EPA Insp MEC

- This includes the TCA information from August 9, 2022 through December 8, 2022 and is partially responsive to request #1.

Excel 4: Steamboat TCA Historical Data

- This includes the TCA pressures for 2020, 2021 and Jan 2022 through August 9, 2022. It is the remaining responsive information for request #1
- This also includes the wellhead tubing injection pressures for 2020, 2021 and 2022 and is responsive to request #2.

As stated above, Merit is still working on the description of the work undertaken to determine the cause of the TCA pressures. This will be uploaded in the next week, and Merit will send you an email once uploaded. If there is anything else that you need, please let me know.

Thanks,

Casey Hall

Merit Energy Company

13727 Noel Road, Suite 1200

Dallas, TX 75240

Cell: (214) 957-1502

Office: (972) 628-1440

From: Wiser, Nathan <Wiser.Nathan@epa.gov>

Sent: Tuesday, December 20, 2022 9:19 AM

To: Hall, Casey <Casey.Hall@meritenergy.com>

Cc: Lyles, Kat <Kat.Lyles@meritenergy.com>; Kittinger, Eric <Eric.Kittinger@meritenergy.com>; Lampard, Melissa <Melissa.Lampard@meritenergy.com>

Subject: RE: Merit FTP

EXTERNAL EMAIL

Hello Casey,

Does this upload of various documents to the Merit FTP site constitute Merit's complete and total response to EPA's 11/18/22 request for information letter?

Please let me know if I have accurately catalogued the total uploaded files to Merit's FTP site, as described below. I count 49 total files.

Main Folder (Folder "2022 Steamboat Butte EPA Wells"), contains

- A. One Subfolder ("EPA Letter & Response-Eric") plus the nine files under A(1) below
 1. 1 PDF file - EPA's 11/18/22 request for information (RFI) letter to Merit
 2. 1 PDF file - EPA's Table 1 enclosure to the 11/18/22 RFI letter
 3. 1 PDF file - EPA's Table 2 enclosure to the 11/18/22 RFI letter
 4. 1 PDF file - EPA's Table 3 enclosure to the 11/18/22 RFI letter
 5. 1 XLS file - MERITENERGY-STEAMBOATBUTTEGASSTUDIES12-12-2022 spreadsheet
 6. 1 XLS file - MERITENERGY-TRIBALGASSTUDIES12-12-2022 spreadsheet
 7. 1 MSG file - RE_Steamboat EPA Injection Wells.msg email
 8. 1 XLS file - SBB Inj EPA Insp MEC spreadsheet that includes tubing/casing annulus pressures monitored by Merit from EPA's 8/9/22 inspection through 12/8/22
 9. 1 XLS file - Steamboat TCA Historical Data spreadsheet that includes tubing and tubing/casing annulus pressures recorded by Merit at Steamboat Butte inj wells from 1/1/20 thru 11/21/22

- B. Under the Subfolder "EPA Letter & Response-Eric", there are two additional subfolders plus four duplicated files (the EPA 11/18/22 RFI letter and its 3 enclosures)
1. 1 PDF file - EPA's 11/18/22 request for information (RFI) letter to Merit
 2. 1 PDF file - EPA's Table 1 enclosure to the 11/18/22 RFI letter
 3. 1 PDF file - EPA's Table 2 enclosure to the 11/18/22 RFI letter
 4. 1 PDF file - EPA's Table 3 enclosure to the 11/18/22 RFI letter
- 1.
- 1.
 - 2.
 - 3.
 - 4.
 5. Subfolder 2020 includes 35 files:
 - i. 1 Word file - Merit's 2/2/2021 annual monitoring report transmittal letter to Gary Wang,
 - ii. 2 PDF files - sets of chemical analyses of injected fluids taken from different points in the field,
 - iii. 1 PDF file - Steamboat Butte field flow line map,
 - iv. 1 PDF file - 30 combined EPA Forms 7520-11 for Steamboat Butte injection wells,
 - v. 30 PDF files – each an individual EPA Form 7520-11 for Steamboat Butte injection well (the same 7520-11 forms combined in B(5)(iv) above)
 - 2)
 - 3)
 - 4)
 - 5)
 - 6) Subfolder 2021 includes 1 file
 - i. 1 PDF file – Steamboat Butte 2021 EPA Annual Injection Packet Submitted 02.2022 (containing 30 EPA Forms 7520-11, plus files similar to those listed in B(5)(i)-(iv) above)

--Nathan Wiser, Environmental Scientist
U.S. EPA Region 8
1595 Wynkoop Street (mail code 8ENF-W-SD)
Denver, Colorado 80202
Email: wiser.nathan@epa.gov
Office: 303-312-6211

For information about the EPA R8 UIC Program: <https://www.epa.gov/uic/underground-injection-control-epa-region-8-co-mt-nd-sd-ut-and-wy>

From: Hall, Casey <Casey.Hall@meritenergy.com>
Sent: Monday, December 19, 2022 3:02 PM
To: Wiser, Nathan <Wiser.Nathan@epa.gov>
Cc: Lyles, Kat <Kat.Lyles@meritenergy.com>; Kittinger, Eric <Eric.Kittinger@meritenergy.com>; Lampard, Melissa <Melissa.Lampard@meritenergy.com>
Subject: RE: Merit FTP

Nathan-

The Steamboat gas testing data has been uploaded to the FTP on 12/19/2022. The sampling occurred on 11/30/2022 and 12/1/2022 by American Mobile Research. Samples were taken from 23 wellbores as well as 3 Production Flares. After the samples were performed, all of the wells (if not already at 0 PSI) were bled to 0 PSI. TCA Pressures were then recorded on 12/8/2022.

Thank you and let me know if you have any further questions.

Casey Hall**Merit Energy Company**

13727 Noel Road, Suite 1200
Dallas, TX 75240
Cell: (214) 957-1502
Office: (972) 628-1440

From: Hall, Casey

Sent: Sunday, December 18, 2022 7:03 PM

To: Wiser, Nathan <Wiser.Nathan@epa.gov>; Edwards, Michael <Michael.Edwards@meritenergy.com>

Subject: RE: Merit FTP

That's correct Nathan. We will upload the testing once results have been received.

Thanks,

Casey Hall**Merit Energy Company**

13727 Noel Road, Suite 1200
Dallas, TX 75240
Cell: (214) 957-1502
Office: (972) 628-1440

From: Wiser, Nathan <Wiser.Nathan@epa.gov>

Sent: Friday, December 16, 2022 3:56 PM

To: Edwards, Michael <Michael.Edwards@meritenergy.com>

Cc: Hall, Casey <Casey.Hall@meritenergy.com>

Subject: RE: Merit FTP

EXTERNAL EMAIL

Edward and Casey,

Today (Fri 12/16/22) I completed the account request and submitted that request. I presume this is being done so as to allow my access to records Merit is providing in response to EPA's 11/18/22 request for information.

Thanks.

--Nathan Wiser, Environmental Scientist

U.S. EPA Region 8

1595 Wynkoop Street (mail code 8ENF-W-SD)

Denver, Colorado 80202

Email: wiser.nathan@epa.gov

Office: 303-312-6211

For information about the EPA R8 UIC Program: <https://www.epa.gov/uic/underground-injection-control-epa-region-8-co-mt-nd-sd-ut-and-wy>

From: Edwards, Michael <Michael.Edwards@meritenergy.com>

Sent: Friday, December 16, 2022 12:27 PM

To: Wiser, Nathan <Wiser.Nathan@epa.gov>

Cc: Hall, Casey <Casey.Hall@meritenergy.com>

Subject: Merit FTP

Hello,

Here is how to gain access to the Merit FTP.

The ftp site that you requested is called **2022 Steamboat Field EPA Wells**

This is important! -> Fill out form for new account creation making sure to put **2022 Steamboat Field EPA Wells** as the **justification** for the account.

For users outside of Merit, please have them follow these steps:

1. Go to <https://transfer.meritenergy.com/login>
2. Click on the link that says "Request an Account" located at the bottom of the form.



Thanks,
Michael Edwards
Merit Energy Company
Senior Systems Engineer
Office: (972) 628-1624